

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No. 23-01092 (MBK)

**NOTICE OF DEBTOR'S MOTION FOR A BRIDGE
ORDER CONFIRMING THE AUTOMATIC STAY APPLIES
TO CERTAIN ACTIONS ASSERTED AGAINST AFFILIATES OR
TEMPORARILY EXTENDING THE STAY AND PRELIMINARY INJUNCTION
TO SUCH ACTIONS PENDING A FINAL HEARING ON THE REQUESTED RELIEF**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE NOTICE that, on the date set by the Court pursuant to a proposed Order Shortening Time (“OST”) and Application therefor to be submitted, LTL Management LLC, the above-captioned debtor (the “Debtor”), by and through its counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Court, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of a bridge order, pursuant to sections 105(a) and 362(a) of title 11 of the United States Code: (i) confirming that the automatic stay applies to certain actions (collectively, the “Successor Liability Actions”) that assert claims wholly or principally under theories of successor liability against two of the Debtor’s affiliates, Janssen Pharmaceuticals, Inc. (“Janssen”) and Kenvue Inc. (“Kenvue”); or (ii) temporarily extending the stay and preliminary injunction currently in effect to the claims asserted against Janssen and Kenvue in the Successor Liability Actions pending a final hearing scheduled for June 13, 2023.

The Successor Liability Actions are:

- Naranjo v. Johnson & Johnson, No. MID L-6108-21AS (N.J. Super. Ct. Oct. 20, 2021);
- Pressler v. Johnson & Johnson, No. MID-L001944-23, (N.J. Super. Ct. Apr. 5, 2023);
- Cruz v. Kenvue, No. MID-L-002093-23, (N.J. Super. Ct. April 13, 2023);
- Bergeron v. Kenvue Inc., No. MID-L-002089-23, (N.J. Super. Ct. Apr. 13, 2023);
- Dumas v. Kenvue, Inc., No. MID-L-002090-23, (N.J. Super. Ct. Apr. 13, 2023);
- El Ramadi v. Kenvue, Inc., No. MID-L-002092-23, (N.J. Super. Ct. Apr. 13, 2023);
- Boyle v. Kenvue, Inc., No. MID-L-002094-23 (N.J. Super. Ct. Apr. 13, 2023);
- Drolet v. Kenvue Inc., No. MID-L-002095-23, (N.J. Super. Ct. Apr. 13, 2023); and
- Magee v. Janssen Pharma., Inc., No. MID-L-002268-23 (N.J. Super. Ct. Apr. 21, 2023).

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon the Debtor's proposed undersigned counsel in accordance with any OST entered by the Court.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d), and the requested relief may be granted without a hearing.

Dated: May 31, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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